

Fitzgerald & Associates, P.C.
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649 Newark Avenue
Jersey City, NJ 07306-2303
(201) 533-1100
Attorney for Debtor

United States Bankruptcy Court
District of New Jersey

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In Re:

Patricia Campos

Chapter 13

Debtor

Case No. 12-35515/DHS
Hon. Donald H. Steckroth

NOTICE OF MOTION TO EXPUNGE
PROOF OF CLAIM SUBMITTED BY
INSOLVE RECOVERY, LLC

ORAL ARGUMENT REQUESTED
ONLY IF OPPOSITION FILED

HEARING DATE: 11/13/13
11:00 a.m.

-----X
To:

Insolve Recovery, LLC
c/o Capital Recovery Group, LLC
Dept. 3203
PO Box 123203
Dallas, TX 75312-3203

Marie-Ann Greenberg, Chapter 13 Standing Trustee
30 Two Bridges Road, Suite 330
Fairfield, NJ 07004

The debtor has filed papers with the Court for an Order objecting to your claim and other such relief as the Court may deem appropriate.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in

this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the Court to expunge your claim or if you want the Court to consider your views on the motion, then within seven (7) days prior to the scheduled hearing you or your attorney must:

File a written response in opposition to this motion explaining your position(s) and send it to:

Clerk
United States Bankruptcy Court
King Federal Building
50 Walnut Street -- 3rd Floor
Newark, NJ 07102

If you mail your response to the Court for filing, you must mail it early enough so the Court will receive it on or before the date stated above.

You must also mail a copy to:

Nicholas Fitzgerald
Fitzgerald & Associates, P.S.
649 Newark Avenue
Jersey City, NJ 07306-2303

Marie-Ann Greenberg, Chapter 13 Standing Trustee
30 Two Bridges Road, Suite 230
Fairfield, NJ 07004

**IF YOU OPPOSE THE RELIEF REQUESTED HEREIN YOU SHOULD ATTEND
THE HEARING SCHEDULED TO BE HELD BEFORE**

Honorable: Donald H. Steckroth
Date: 11/13/13
Time: 11:00 a.m.
Place:

United States Bankruptcy Court
King Federal Building
50 Walnut Street -- 3rd Floor, Courtroom 3-B
Newark, NJ 07102

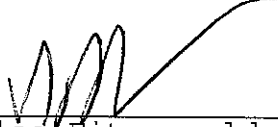
Pursuant to D.N.J. LBR 9013-1(d) et seq., if you wish to contest the within motion, you must file with the Office of the Clerk of the Bankruptcy Court, responding papers stating with

particularity the basis of your opposition to the within Motion. A copy of the proposed Order which is sought is enclosed with this Motion.

As the facts the petitioner relies upon, as set forth on the accompanying certification and exhibits attached thereto, as clearly set forth in the aforesaid "Local Rule," do not present complicated questions of fact or unique questions of law, it is hereby submitted that no brief is necessary in the Court's consideration of the within Motion.

If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought in the motion or objection and may enter an order granting that relief.

DATED: October 7, 2013



Nicholas Fitzgerald, Esq.
Attorney for Debtor